

Dolinger, Mas

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THOMAS OAKLEY, LUCIANO ABBATIello,
STEVE ACIERNO, RON ADDEO, THOMAS BARRY,
ALYSON BRADLEY, CHARLES BRADY, MARCEL
CABRERA, JOSEPH CARBALLO, MATTHEW
CHRISTIE, LAUREN COLCLOUGH, AILEEN
CORNIELLE, MIKE DOWD, PAUL DUNN, LATONIA
EPPERSON, JULIET FOUNTAIN, GAVIN FRATER,
BRENDA FRITCHY, NILSA GREENE, ADRIANE
GRZYBOWSKI, ELAINE HENDERSON, GEORGE
HOLMAN, KEVIN KAER, KELLY LEE, JEFFREY
LEROY, DENISE LOPEZ, ANGELA LUCAS, MARY
MARTINI, CHRISTOPHER MCCARTHY, DENNIS
MCGEE, NOEL MELENDEZ, ED MIDDENDORF,
DEBBIE MONROE, LAURA NUSS, DAMIAN PARRA,
RAY PEAY, KIMBERLY PEREIRA, MICHELLE PROCK,
PAM REINHEIMER, DAISY RIVERA, ANTHONY
SICURANZO, MARCHELLE SMITH, CHARLES
SPINALE, TAMMI TERRELL, JAMES TREADWAY,
MINDY VEGA, LORRIS WATSON, JUDITH
WHIGHAM, and ADRAINE WHITNEY, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

VERIZON COMMUNICATIONS, INC., VERIZON
WASHINGTON, DC INC., VERIZON SOUTH INC.,
VERIZON DELAWARE LLC, VERIZON AVENUE
CORP. (D/B/A VERIZON ENHANCED COMMUNITIES),
VERIZON PENNSYLVANIA INC., VERIZON NEW
ENGLAND INC., VERIZON NEW JERSEY INC.,
VERIZON SELECT SERVICES INC., VERIZON
TELEPRODUCTS CORP., VERIZON CONNECTED
SOLUTIONS INC., VERIZON NEW YORK INC., EMPIRE
CITY SUBWAY COMPANY (LIMITED), VERIZON
MARYLAND INC., VERIZON VIRGINIA INC.,
VERIZON WEST VIRGINIA INC., VERIZON SERVICES
CORP., VERIZON CORPORATE SERVICES CORP.,

Defendants.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/21/11
ECF CASE

09 Civ. 9175 (CM-MHD)


STIPULATION AND ORDER

Plaintiffs, having on July 21, 2010 served a Notice of Deposition Pursuant to Rule 30(b)(6), in connection with the above-captioned action (copy annexed as Exhibit A), and Defendants Verizon Communications Inc., Verizon Washington, DC Inc. (improperly named in the Amended Complaint as "Verizon Washington, D.C. Inc."), Verizon South Inc. (improperly named in the Amended Complaint as "Verizon South Inc. (Virginia)"), Verizon Pennsylvania Inc., Verizon Delaware LLC (improperly named in the Amended Complaint as "Verizon Delaware Inc."), Verizon New England Inc., Verizon New Jersey Inc., Verizon Select Services Inc., Verizon Teleproducts Corp., Verizon Connected Solutions Inc., Verizon New York Inc., Empire City Subway Company (Limited), Verizon Maryland Inc., Verizon Virginia Inc., Verizon West Virginia Inc., Verizon Services Corp., Verizon Corporate Services Corp. and Verizon Avenue Corp. (d/b/a Verizon Enhanced Communities), having agreed to designate witnesses in response to Plaintiffs' Notice and having on August 13, 2010 served Defendants' Responses and Objections to Plaintiffs' Rule 30(b)(6) Deposition (copy annexed as Exhibit B), the parties, through their respective counsel, subject to the Court's approval, hereby stipulate and agree as follows:

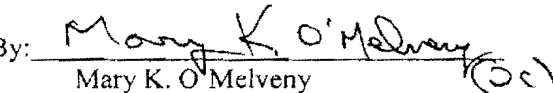
1. That plaintiffs will not use or reference Defendants' Rule 30(b)(6) designations on behalf of the various defendants in connection with any effort to prove any fact relating to class certification or otherwise in this or any other case negotiation or proceeding.
2. That said Rule 30(b)(6) designations in this action by the aforementioned Defendants will not have any precedential value in terms of establishing integrated operations between said Defendants in this or any other case negotiation or proceeding.

Dated: New York, New York
December 30, 2010

SEMEL, YOUNG & NORUM

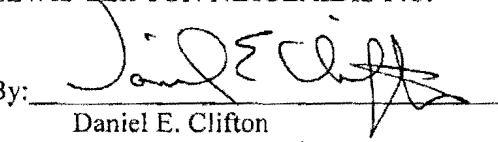
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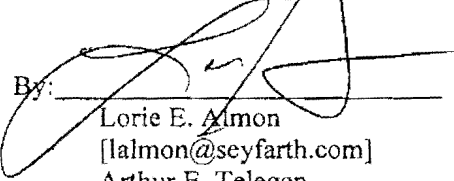
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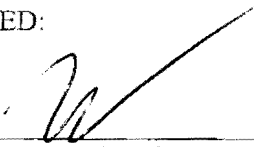
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Verizon Teleproducts Corp.
Verizon Connected Solutions Inc.
Verizon New York Inc.
Empire City Subway Company
(Limited)
Verizon Maryland Inc.
Verizon Virginia Inc.
Verizon West Virginia Inc.
Verizon Services Corp.
Verizon Corporate Services Corp. and
Verizon Avenue Corp. (d/b/a Verizon
Enhanced Communities)*

SO ORDERED:

Dated: New York, New York
January 21, 2011



The Honorable Michael H. Dolinger
United States Magistrate Judge

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